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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 MICHAEL BURCIAGA,
15 Defendant.

Case No. 3:20-cr-00060-MMD-CLB

STIPULATION TO CONTINUE
MOTION DEADLINES
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Rene L Valladares,
18 Federal Public Defender, and CHRISTOPHER P. FREY, Assistant Federal Public Defender,
19 counsel for MICHAEL BURCIAGA, Jason M. Frierson, United States Attorney, and
20 PENELOPE BRADY, Assistant United States Attorney, counsel for the United States of
21 America, that the deadline to file any and all pretrial motions and notices of defense be extended
22 from April 11, 2023, to **April 18, 2023**.

23 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
24 shall have to and including **May 2, 2023**, to file any and all responsive pleadings.
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1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and **May 9, 2023**, to file any and all replies to dispositive motions.

3 This is the first stipulation to continue the motions deadlines. Counsel is requesting
4 additional time to file pretrial motions mindful of the current trial date of June 8, 2023, at 9:00
5 AM, the exercise of due diligence, in the interests of justice, and not for any purpose of delay.

6 DATED this 7th day April, 2023.
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8 RENE L. VALLADARES
9 Federal Public Defender

JASON M. FRIERSON
United States Attorney

10 */s/ Christopher P. Frey*
11 By: _____
12 CHRISTOPHER P. FREY
13 Assistant Federal Public Defender
Counsel for Joshua Michael Burciaga

/s/ Penelope Brady
By: _____
PENELOPE BRADY
Assistant United States Attorney
Counsel for United States

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16 **IT IS SO ORDERED.**

17 **DATED** this 7th day of April, 2023.

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20 MIRANDA M. DU
21 CHIEF UNITED STATES DISTRICT JUDGE
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